



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

**SAFETY EVALUATION REPORT**

**WCS CONSOLIDATED INTERIM STORAGE FACILITY  
MATERIALS LICENSE NO. SNM-2515  
AMENDMENT NO. 1**

**1.0 SUMMARY**

This safety evaluation report (SER) documents the review and evaluation of a license amendment request to SNM License No. 2515 for the WCS Consolidated Interim Storage Facility (CISF). By letter dated January 24, 2022, Interim Storage Partners LLC (ISP) submitted a request to the U.S. Nuclear Regulatory Commission (NRC) in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 72.56, requesting that License Condition 17 of License No. SNM-2515 be revised to clarify the timing of mandatory license amendments relating to incorporation of Aging Management Programs (AMPs) of Part 72 general licensing that are incorporated by reference in SNM-2515.

The proposed change clarifies the timing for ISP to satisfy License Condition 17, which pertains to when the incorporation of any technically relevant portions of AMPs in renewals of Certificates of Compliance (CoCs) Numbers 1015, 1025, and 1031 is required, so that incorporation of AMPs and Time-Limited Aging Analyses (TLAAs) can be combined with future amendments of SNM-2515. ISP's proposed schedular clarification does not impact the design, environmental analyses, the final safety analysis report (FSAR), future operation or future procedures of the facility.

The NRC staff has reviewed the application, including the justifications for the requested changes. As discussed below, based on the staff's evaluation of the application, the staff finds that the requested amendment to Materials License No. SNM-2515 for the WCS CISF meets the regulatory requirements of 10 CFR Part 72.

**2.0 REVIEW CRITERIA**

The staff has conducted an evaluation of the changes requested by ISP to ensure that the WCS CISF still meet the applicable requirements of 10 CFR Part 72 and 10 CFR Part 20. The staff followed the guidance provided in NUREG-2215, "Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities," to conduct the evaluation. The staff's evaluation focused on the changes to SNM-2515 proposed in the amendment request and did not reassess previously approved portions of the license, Technical Specifications, or FSAR. The evaluation for each applicable review discipline is described below.

**3.0 LICENSE CONDITIONS**

Based on staff evaluation, there is no technical change as the modification is limited solely to clarifying the schedule for the incorporation of AMPs and TLAAs, the incorporation of which is already required by the license SNM-2515. The proposed change does not impact the

requirement that all canisters with renewed general license CoCs must have AMPs and TLAs incorporated in SNM-2515 prior to receipt and storage of those canisters at ISP's WCS CISF. The change has no impact on the design, function, or operation of any structures, systems, or components described by the FSAR. Therefore, the change does not reduce the level of safety imposed by the current license. The staff has revised the license condition as requested.

#### **4.0 REQUIREMENTS FOR NOTICING PROPOSED ACTION**

In accordance with 10 CFR 72.16, a Notice of Docketing was published in the *Federal Register* on March 8, 2022 (87 FR 13013). During its acceptance review, staff determined that the proposed amendment did not present a genuine issue to public health and safety. Accordingly, pursuant to 10 CFR 72.46(b)(2), the staff has issued the proposed amendment because it determined that the amendment does not present a genuine issue as to whether the health and safety of the public will be significantly affected. A *Federal Register* Notice of Issuance will be issued notifying the public of the action taken and of the right of interested persons to request a hearing on whether this action should be rescinded or modified.

#### **5.0 ENVIRONMENTAL REVIEW**

The staff reviewed the proposed amendment request against the categorical exclusion criteria in 10 CFR 51.22(c)(11) and determined that the amendment request is administrative in nature. Under 10 CFR 51.22(c)(11), a categorical exclusion from the requirement to prepare an environmental impact statement for such a change is allowed provided the following conditions are satisfied: (i) the amendment would not produce a significant change in either the type or amount of effluents released to the environment, (ii) would not produce a significant increase in occupational radiation exposure, (iii) would not have significant construction impacts, and (iv) would not produce a significant increase in the potential for or consequences from radiological accidents.

After evaluating the amendment request, staff has determined that the amendment: (i) would not produce a significant change in either the type or amount of effluents released to the environment because the amendment does not affect the design, fabrication, or operations of the facility, and consequently does not affect the type or amount of effluents released to the environment; that (ii) the amendment would not produce a significant increase in occupational radiation exposure because these administrative changes do not affect the operations at the facility, nor the amounts of radioactive material authorized for storage at the facility, and consequently would not produce a significant increase in occupational radiation exposure; that (iii) the amendment would not have significant construction impacts because the amendment only clarifies a schedular requirement and is therefore administrative in nature and does not involve construction, and consequently would not have significant construction impacts; and that (iv) the amendment would not produce a significant increase in the potential for or consequences from radiological accidents because the amendment does not decrease the capabilities of personnel to perform their duties or decrease ISP control of the design, fabrication and operation of the facility, and consequently would not produce a significant increase in the potential for or consequences from radiological accidents. Consequently, staff finds the amendment request meets the categorical exclusion criteria in 10 CFR 51.22(c)(11).

## **6.0 CONCLUSION**

Based on its review of the proposed amendment, the staff has determined that there is reasonable assurance that: (i) the activities authorized by the amended license will be conducted without endangering the health and safety of the public, and (ii) these activities will be conducted in compliance with the applicable regulations. The staff has further determined that the issuance of the amendment will not be inimical to the common defense and security. Therefore, the staff approves Amendment No. 1 to Materials License No. SNM-2515 for the WCS CISF.

Issued with Materials License No. SNM-2515, Amendment No. 1, dated: May 26, 2022